

Exhibit A.
(would not print
any larger)

THE LAW OFFICES OF
DALE W. PITTMAN, P.C.
THE EDNA SPOTSWOOD HOUSE
112-A WEST TARA STREET
PETERSBURG, VIRGINIA 23103-1212
TELEPHONE (804) 851-0020
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DALE W. PITTMAN
dale@pittmanlawoffice.com

August 25, 2011

By Facsimile to (578) 341-5551, by e-mail to msflaw@jlaw@gmail.com, and by U.S. Mail

Mark A. Carey, Esquire
1000 McCoy Drive
Conyers, GA 30094

Re: Noel Bralley, Carolyn Bralley, and Braxton J. Bralley v. Mark A. Carey,
et al., Civil Action No. 3:10cv0138

Dear Mr. Carey:

On this past Tuesday afternoon, August 23, 2011, Vickie L. Walker, your Executive Assistant, forwarded to me by email Defendants' discovery objections and responses to Plaintiffs' First Set of Postjudgment Interrogatories and Request for Production of Documents. The following day, August 24, I emailed Ms. Walker back and requested that she ask you if you were available today for a meet and confer conference call as to the objections and responses. This morning I received from Ms. Walker the attached email advising that she no longer works for you, that the firm ceased taking on new business as of last week, and that today is her last day.

Would you kindly advise me as to your availability today for a meet and confer conference call. I consider the objections and responses deficient in numerous respects. Please be advised that unless we are able to resolve these concerns through the meet and confer process, Plaintiffs will take a position with the Court that Defendants have not fully and adequately, and in a manner that should be sufficient to the satisfaction of the Court, complied with all pending discovery requests, as required by paragraph 1, page 1, of the Court's July 26 2011 Order, Docket 53.

Please contact me immediately. Thank you.

Yours very truly,



Dale W. Pittman

Enclosure

Copies to: Noel Bralley
Carolyn Bralley
Braxton J. Bralley

Exhibit B

Sent: Wednesday, August 31, 2011 11:07 AM

To: dale@pittmanlawoffice.com

Subject: FW: Bralley - Meet & Confer

See Mr. Carey's below email.

Karen Graham

The Law Office of Dale W. Pittman, P.C.

112-A W. Tabb Street

Petersburg, VA 23803

(804) 861-6000

(804) 861-3368 fax

From: Mark Carey

[\[mailto:markcareylaw@ymail.com\]](mailto:markcareylaw@ymail.com)

Sent: Wednesday, August 31, 2011 11:04 AM

To: Karen Graham

Subject: Re: Bralley - Meet & Confer

Karen:

I did not receive a call from Dale yesterday, despite my availability, nor have I received an email from him outlining his issues with my discovery responses. If any were sent, please let me know, because I have not received them.

Thank you for your attention to this matter.

Sincerely,

Mark

From: Karen Graham

[<karen@pittmanlawoffice.com>](mailto:karen@pittmanlawoffice.com)

To: markcareylaw@ymail.com

Cc: Dale Pittman [<dale@pittmanlawoffice.com>](mailto:dale@pittmanlawoffice.com)

Sent: Thursday, August 25, 2011 12:51 PM

Subject: Bralley - Meet & Confer

FROM: Dale Pittman dale@pittmanlawoffice.com, August 31, 2011 12:35 PM
TO: markcareylaw@ymail.com
CC: Karen Graham

Mr. Carey,

I am available for a meet and confer telephone call this afternoon at 4:00. If you would like to give me a number I would be happy to call you.

Thank you.

Dale Pittman

THE LAW OFFICE OF DALE W. PITTMAN, P.C.
The Eliza Spotswood House
112-A West Tabb Street
Petersburg, Virginia 23803
(804) 861-6000 - Telephone
(804) 861-3368 - Fax
dale@pittmanlawoffice.com

From: Karen Graham
[mailto:karen@pittmanlawoffice.com]
Sent: Wednesday, August 31, 2011 11:07 AM
To: dale@pittmanlawoffice.com
Subject: FW: Bralley - Meet & Confer

See Mr. Carey's below email.

Karen Graham
The Law Office of Dale W. Pittman, P.C.
112-A W. Tabb Street
Petersburg, VA 23803
(804) 861-6000
(804) 861-3368 fax

From: Mark Carey
[mailto:markcareylaw@ymail.com]
Sent: Wednesday, August 31, 2011 11:04 AM
To: Karen Graham
Subject: Re: Bralley - Meet & Confer

FROM: Dale Pittman lay, August 31, 2011 6:24 PM
TO: Mark Carey
CC: Karen Graham

Mark,

It is not helpful for you to attempt to create a "record" for some purpose by purporting to "confirm" matters that are not accurate. By way of example, I did not cut the conversation off, you hung up in mid call; I have never threatened at the beginning of this case or otherwise to put you out of business.

Dale Pittman

THE LAW OFFICE OF DALE W. PITTMAN, P.C.
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(804) 861-6000 - Telephone
(804) 861-3368 - Fax
dale@pittmanlawoffice.com

From: Mark Carey
[mailto:markcareylaw@ymail.com]
Sent: Wednesday, August 31, 2011 5:33 PM
To: Dale Pittman
Subject: Re: Bralley - Meet & Confer

Dale:

I appreciate your calling at 4:45 in the afternoon and I regret that you cut the conversation off. I regret further that you categorically refused my simple, reasonable request that you provide for me a brief email outlining your objections to my discovery responses. I disagree with your assessment that I have refused to respond to discovery. As I pointed out during our brief conversation, I responded to each of your requests. Mounting a good faith objection to a request or an interrogatory is not refusing to respond. As the Judge pointed out I was allowed

cont'd next page

to object and he would rule on that objection. It is not, as you assert, grounds to report to the judge that I have not met my obligations with his Order. Given your history with this matter of saying one thing and doing another, I think you can understand why I asked for your objections in writing. I also am tiring of your threats against me. You began this litigation by threatening to put me out of business and you continue to find way to threaten me. There is no reason for it. Please refrain from making them in the future.

Again, if you would like to let me know which of my discovery responses you find inadequate, I would be more than happy to explain to you my responses.

Mark Carey

From: Dale Pittman
<dale@pittmanlawoffice.com>
To: markcareylaw@ymail.com
Cc: Karen Graham
<karen@pittmanlawoffice.com>
Sent: Wednesday, August 31, 2011 12:35 PM
Subject: FW: Bralley - Meet & Confer

Mr. Carey,

I am available for a meet and confer telephone call this afternoon at 4:00. If you would like to give me a number I would be happy to call you.

Thank you.

Dale Pittman

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From: Karen Graham